



980 Ninth Street, 16th Floor
Sacramento, CA 95814
(916) 449-9603 (916) 449-9604 FAX
www.capcoa.org

May 21, 2008

PRESIDENT

Douglas Quetin
Monterey Bay Unified
APCD

VICE PRESIDENT

Terry Dressler
Santa Barbara County
APCD

PAST PRESIDENT

Larry Allen
San Luis Obispo County
APCD

**SECRETARY/CHIEF
FINANCIAL OFFICER**

Mat Ehrhardt
Yolo-Solano AQMD

DIRECTORS

Jack Broadbent
Bay Area AQMD

Thomas Christofk
Placer County APCD

Larry F. Greene
Sacramento Metro AQMD

Barbara Lee
N. Sonoma County APCD

Sayed Sadredin
San Joaquin Valley APCD

Robert Kard
San Diego County APCD

David Valler
Feather River AQMD

W. James Wagoner
Butte County AQMD

Barry Wallerstein
South Coast AQMD

Mike Villegas
Ventura Count APCD

EXEC. DIRECTOR

Melvin D. Zeldin
melz@capcoa.org

Panama Bartholomy
California Energy Commission
1516 Ninth Street, MS-33
Sacramento, CA 95814-5512

SUBJECT: CAPCOA Comments on the LUSCAT Submission to the CARB
Scoping Plan on Local Government, Land Use and Transportation

Dear Mr. Bartholomy:

The LUSCAT submittal to the California Air Resources Scoping Plan on Local Government, Land Use and Transportation provides a comprehensive look at the myriad issues and factors associated with land use and transportation and how they affect Greenhouse Gas (GHG) emissions in California. As identified in the report, the majority of the State's GHG emissions related to land use are the result of infrastructure and development decisions: how we build our buildings, where we put them, and the quality and type of infrastructure required to serve them. The LUSCAT submittal provides many important recommendations to the California Air Resources Board in determining how to address these issues in the AB 32 Scoping Plan.

CAPCOA served on the LUSCAT Advisory Committee and has reviewed the submittal document. The following comments address five general topic areas discussed in the LUSCAT submittal. Additional comments on the LUSCAT recommendations may be provided by individual air districts as the process moves forward.

Regional Greenhouse Gas Targets

CAPCOA sees Regional GHG targets as an important tool in guiding the effort to reduce emissions from transportation and energy use related to existing and future land use development patterns. As such, it is important for the Scoping Plan to include specific details on how regional GHG targets will be defined, and the mechanism by which regional agencies and local governments will be responsible for achieving the targets. We believe the process for setting regional targets should include consideration of the following factors:

- GHG reduction targets should be based on an equitable distribution of reductions needed from all emission sectors.
- Targets should be technically and economically feasible to achieve.

- Consideration of the level and location of different types of residential, commercial and industrial development expected to occur over the next several decades should be factored into the equation used to establish specific targets for each region.

Successful implementation of regional GHG targets will require significant coordination between regional planning agencies, local governments and affected stakeholders to incorporate the targets into comprehensive regional and local land use, transportation and air quality plans. At the local level, one implementation strategy could be for local governments to incorporate climate action plans into their general plan updates that are consistent with the regional targets.

Finally, it will be critical for the State to work closely with local government in their efforts to reduce GHGs associated with land use and transportation. Through their budget process, the State should develop mechanisms to incentivize compliance with regional GHG targets and establish criteria for rewarding enhanced progress toward achieving the targets.

Guidance and Quantification

Adequate guidance and effective tools, such as GHG quantification protocols and best practices for GHG reductions, are essential for helping regions to achieve GHG reduction targets. Guidance on projects subject to CEQA is also critical for developers and local government to understand the role and requirements for new development in meeting regional GHG targets. Establishing a statewide GHG threshold would ensure that emissions and mitigation requirements are addressed in a consistent and effective manner for all new projects in California, and will eliminate a potential incentive for new projects to move to areas with less stringent requirements. Local implementation of a statewide threshold should be closely linked to achieving the GHG reduction targets established for the region.

State Infrastructure and Programs

The Scoping Plan should require State agencies to be responsible for achieving GHG reduction targets for infrastructure and facilities they control and manage. State agencies should implement projects to demonstrate leadership and serve as models for local governments and businesses.

Reducing Barriers to Efficient Land Use Development

The Scoping Plan should establish a process to identify and remove barriers to GHG-efficient land use development, and also ensure that removing such barriers does not have the potential to negatively impact public health (e.g. – allowing the siting of a toxic emission source near residential development or other sensitive receptors).

Environmental Justice

CAPCOA strongly believes the state needs to evaluate the impacts of all of its programs to identify and address impacts on low income communities and communities of color. State law requires this, and AB 32 specifically mandates that ARB ensure the programs developed to implement the statute do not create or exacerbate environmental justice problems. Land use decisions are critical to preventing and resolving environmental justice problems and CAPCOA believes that a consideration of environmental justice should be a fundamental element of the land use strategies advanced under AB 32. Further, as different revenue streams are created

under AB 32, we believe the state may have opportunities to dedicate funds to mitigating impacts on these communities; we encourage the state to take advantage of such opportunities.

CAPCOA appreciates the opportunity to provide input to this important process. Local air districts have extensive technical and policy expertise in working with local government on land use and transportation programs as they affect air quality and climate change. Thus, we would encourage you to call upon CAPCOA to utilize the expertise embodied in its membership to assist the LUSCAT and ARB as they move forward in further development and implementation of the land use and transportation strategies adopted through the AB 32 Scoping Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Douglas Quetin". The signature is stylized with a large, looped "D" and a long, sweeping underline.

Douglas Quetin
President